

Christopher A. Turtzo; NV Bar No. 10253
MORRIS, SULLIVAN & LEMKUL, LLP
3960 Howard Hughes Parkway, Suite 400
Las Vegas, NV 89169
Tel: (702) 405-8100
Fax: (702) 405-8101
Email: turtzo@morrisullivanlaw.com

Patrick Coughlin (*pro hac vice* forthcoming)
Carmen Medici (*pro hac vice* filed)
Fatima Brizuela (*pro hac vice* filed)
Daniel J. Brockwell (*pro hac vice* filed)
**SCOTT+SCOTT ATTORNEYS AT LAW
LLP**
600 W. Broadway, Suite 3300
San Diego, CA 92101
Tel: (619) 233-4565
Fax: (619) 233-0508
pcoughlin@scott-scott.com
cmedici@scott-scott.com

[Additional attorneys listed on signature page.]

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DANIEL ROSENBAUM; RENELDO
RODRIGUEZ; and THOMAS CARON,
Individually and on Behalf of All Others
Similarly Situated,

Plaintiffs,

v.

PERMIAN RESOURCES CORP. f/k/a
CENTENNIAL RESOURCE
DEVELOPMENT, INC.; CHESAPEAKE
ENERGY CORPORATION;
CONTINENTAL RESOURCES INC.;
DIAMONDBACK ENERGY, INC.; EOG
RESOURCES, INC.; HESS CORPORATION;
OCCIDENTAL PETROLEUM
CORPORATION; and PIONEER NATURAL
RESOURCES COMPANY,

Defendants.

Case No. 2:24-cv-00103

**MOTION FOR THE EXTENSION OF TIME
TO FILE PRO HAC VICE APPLICATIONS**

1 Plaintiffs Daniel Rosenbaum, Reneldo Rodriguez, and Thomas Caron, individually and on
2 behalf of all others similarly situated, hereby request a thirty (30) day extension of the time for the
3 following Plaintiffs' Counsel to file their *pro hac vice* applications with the Court: Patrick Coughlin,
4 Michael Srodoski, Patrick Rodriguez, and Isabella De Lisi.

5 This request is submitted in compliance with LR IA 6-1. This is the Plaintiffs' first request
6 for an extension of time. Plaintiffs filed their Complaint on January 12, 2024 (ECF No. 1). The
7 deadline for Counsel to submit their completed *pro hac vice* applications is January 30, 2024 (ECF
8 No. 2). Plaintiffs' Counsel are requesting this extension due to a delay in receiving Certificates of
9 Good Standing from each of the courts in which the attorney is admitted, which were requested
10 shortly after Plaintiffs' complaint was filed. Therefore, good cause exists for the requested extension.
11 The requested extension furthers the interest of this litigation and is not being requested in bad faith
12 or to delay these proceedings unnecessarily.

13 Accordingly, Plaintiffs respectfully request an extension of up to and including March 1,
14 2024.

15
16 DATED: January 22, 2024

17 **MORRIS, SULLIVAN & LEMKUL, LLP**

18 /s/ Christopher A. Turtzo

19 Christopher A. Turtzo; NV Bar No. 10253

20 3960 Howard Hughes Parkway, Suite 400

21 Las Vegas, NV 89169

22 Tel: (702) 405-8100

23 Fax: (702) 405-8101

24 turtzo@morrisullivanlaw.com

25
26 *Local Counsel for Plaintiffs*
27
28

SCOTT+SCOTT ATTORNEYS AT LAW LLP

Patrick J. Coughlin
Carmen Medici
Fatima Brizuela
Daniel J. Brockwell
600 W. Broadway, Suite 3300
San Diego, CA 92101
Tel: (619) 233-4565
pcoughlin@scott-scott.com
cmedici@scott-scott.com
fbrizuela@scott-scott.com
dbrockwell@scott-scott.com

SCOTT+SCOTT ATTORNEYS AT LAW LLP

Patrick McGahan
Michael Srodoski
Isabella De Lisi
Zachary Kranc
156 S Main Street
P.O. Box 192
Colchester, CT 06415
Tel: (860) 537-5537
pmcgahan@scott-scott.com
msrodoski@scott-scott.com
idelisi@scott-scott.com
zkranc@scott-scott.com

SCOTT+SCOTT ATTORNEYS AT LAW LLP

Patrick Rodriguez
230 Park Ave., 17th Floor
New York, NY 11069
Tel: (212) 223-6444
prodriguez@scott-scott.com

Counsel for Plaintiffs

ORDER

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

DATED: 1-31-2024